



Office of the
CHURCHILL COUNTY COMMISSIONERS

Gwen Washburn
Lynn Pearce
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RRR000523

January 3, 2008

EIS Office
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
1551 Hillshire Dr.
Las Vegas, NV. 89134

Facsimile transmission 1-800-967-0739

RE: Comments to the Draft Environmental Impact Statement

Draft Supplemental Environmental Impact Statement for A Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nevada, Nye County, Nevada (DOE/EIS-0250F-SID) (Draft Repository SEIS), and;

Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada.

To Whom It May Concern:

As one of ten affected units of local government participating in the oversight of the proposed Yucca Mountain repository program, Churchill County is pleased to submit the enclosed comments for the above referenced environmental impact statements. The comments being submitted by the County generally pertain to the Mina Corridor. However, there are a number of issues related to specific resource impacts, monitoring and mitigation requirements that are common to both rail corridors. Overall, Churchill County remains concerned about the level of commitment DOE has for providing adequate mitigation and the monitoring of long-term impacts associated with rail construction.

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Submitted By:
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General Comments

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- 77 [Pg 2-15 Hydrology- This section simply describes what could happen and not whether there will or will not be impacts. There is no impact analysis.]
- 78 [Pg 2-14 Summary of impacts. The summary generally lacks sufficient qualitative or quantitative analysis.]

- 14 [Pg. 3.4 Para. 4 The Mina Rail Corridor should have included all areas up to Hazen. Yucca Mountain would become the largest user on the rail line. It is difficult to understand how DOE can segment the Mina Rail corridor with the rail line below Wabuska being the corridor and the rail line above it not. Please explain.]
- 15 [Land Use Section- The impact analysis does not quantify or qualify any impacts. The analysis discusses potential conflicts and issues, but does not consider them small, medium or large, why? There are significant impacts when new rail construction occurs on private lands. This section calls for impacts on grazing operations and loss of forage, but offers nothing in terms of mitigation. Why?]
- 16 [Figure 3-1 should be expanded to include Churchill County portion of the Mina Rail Corridor.]
- 17 [Pg. 3-14 DOE failed to include a discussion of Lahontan Reservoir that is adjacent to the Mina Corridor. The reservoir and the Carson River are adjacent to the corridor. Both features are important locally and regionally to provide agricultural and drinking water supplies in the region.]
- 18 [Pg. 3-15 para. 2 The perennial water bodies should include the Carson River and Lahontan Reservoir.]
- 19 [Figure 3.5 DOE should include a similar figure which shows the surface water features in the corridor.]
- 20 [Pg. 3-20 para. 5 What are the impacts to water quality from bridge construction and what is the appropriate mitigation. Please explain.]
- 21 [Section 3.2.3.2.1 Surface water section offers little in the way of impact analysis and nothing in terms of mitigation. More specific details should be provided.]
- 22 [Section 3.2.3.2.2 Groundwater. DOE needs to describes its options to provide adequate water for rail construction activities in the event the State Engineer denies permits for wells supporting construction. Also, DOE needs to describe how it will meet drinking water standards for construction camps in the event groundwater does not meet MCLs.]
- 23 [Section 3.2.3.2.1 This section is incomplete because adequate cultural resource analysis has not been completed for the corridor.]
- 24 [Pg. 3-33 3.2.6.2.2.4 During the shipment of spent nuclear fuel and high-level radioactive waste from the Hazen siding to Yucca Mountain, people along the rail line could be exposed to direct radiation from approximately 9,500 shipping casks. What about people along the corridor from Hazen to Salt Lake City. DOE did not analyze this section of rail. Is it similar to national transportation impacts? Why distinguish the Mina Corridor from national transportation impacts?]

- 25 [Pg. 3-35, Sec. 3.2.7 The region of influence for the socioeconomic analysis is defined as those Nevada counties the Mina rail corridor would cross, and the two areas where most workers would be expected to reside (the Carson City/Washoe County area and Clark County). Churchill County will have far greater socioeconomic impacts than Carson City. It is the largest urban community near the rail line. Furthermore, the County has the construction sector capable for participating in rail construction.]
- 26 [Pg. 3-32 To estimate transportation impacts, DOE defined the region of influence beginning at the Hazen siding in Churchill County, Nevada, and ending at Yucca Mountain. Why does DOE use Hazen to Yucca Mountain as a region of influence and ignore it for socioeconomic and other resources?]
- 27 [Pg. 3-35 The per capita income in this paragraph for Carson City is wrong. The Bureau of Economic Analysis shows 2000 per capita income for Carson City to be \$32,041.]
- 28 [Table 3-10 should have shown Churchill County and other Nevada Counties along the Northern Union Pacific Branchline.]
- 29 [Pg. 3-35, last paragraph- Unless otherwise noted, all general demographic, social, economic, and housing information was estimated by the U.S. Census Bureau during the 2000 decennial national census and was reported in the Census American FactFinder. There is more current socioeconomic data available. Where available, the text should be updated to current. The 2000 Census is nearly 8 years old.]
- 30 [Table 3-11 should be updated with current information. There is current per capita income, housing inventories (Demographer), unemployment, school enrollment, etc. Churchill County should be included in this Table. It has a higher potential for socioeconomic impacts than Carson City.]
- 31 [Table 3-12 Churchill County should have been included in this Table. The table should be updated with more recent information.]
- 32 [Sec. 3.2.7.2.1.3 pg 3-43 There is no discussion of impacts to local emergency response and public safety services for construction and operations. The Hawthorne Army Ammunition Depot has a hazmat team. Will they be utilized in the event of an accident? DOE has completely ignored this issue. Construction certainly results in impacts to local public safety and emergency resources. Where is the analysis?]
- 33 [Pg. 4-1 Cumulative Impact Analysis- The most important cumulative analysis is the past, present and reasonably foreseeable radioactive waste shipments to and from the Yucca Mountain and the Nevada Test Site. With the extension of power plant operating licenses and new applications for nuclear power plants, it is reasonable to assume that waste shipped and stored at Yucca Mountain could increase substantially. The cumulative analysis should have examined this issue.]

- 34 [Pg. 4-1 Cumulative Impacts- DOE needs to examine the increased rail activity and the impacts to transportation in the region.]
- 35 [Pg 4-23 DOE has not addressed the use of groundwater for drinking water supplies and how it intends to meet drinking water standards for human consumption at construction camps.]
- 36 [Sec. 4.2.2.4.2 DOE needs to set forth measures it will implement to control invasive and noxious weeds during construction. Neither the cumulative impact section or the impact analysis addresses this issue. Monitoring should be required.]

Volume II Mina Rail Corridor

- 37 [Alternative Segments. DOE needs to consider alternative segments around the Walker Reservation. With the costs of reconstruction through Indian Lands, DOE could have considered other options to avoid the reservation.]
- 38 [Most of the impact analysis related to the Caliente and Mina Corridor are cursory discussions with little or no real analysis. The impacts are based largely upon qualitative subject judgments.]
- 39 [Section 4.3.2.2.1.2 DOE would need to gain access to private land that falls within the Mina rail alignment construction right-of-way and the locations of support facilities. Segments that would cross private lands include Mina common segment. DOE needs to describe how they will obtain access to private lands, what compensation or mitigation will be provided?]
- 40 [Section 4.3.2.2.3.2 DOE needs to quantify impacts to grazing, set forth committed mitigation, work with permittees and BLM to return the allotment to pre-construction conditions. Grazing operations should not have to incur aum reductions. DOE also needs to quantify the life time value of the loss in grazing.]
- 41 [DOE needs to explain how they would acquire permits for construction camp water and wastewater systems. The water system would need to provide water capable of meeting drinking water standards. Also, details for meeting fireflow requirements and water storage should be noted. Wastewater treatment requires the disposal and use of treated effluent. How will DOE dispose of their treated effluent during the winter months when land application is not possible?]
- 42 [Sec. 4.3.9.2.3.3 DOE needs to ensure that adequate fire suppression exists to control potential for wildland fires. This section did not address emergency medical impacts.]
- 43 [Sec. 4.3.9.12.3.4 Accommodations could be made to decrease the possibility of adverse impacts to local law enforcement capacity. DOE needs to specify those accommodations. Typically, County Sheriffs only have one or two patrol officers available to response to

calls. Responses to distant locations associated with rail construction could have very negative impacts on local public safety capabilities.]

- 44 [Sec. 4.3.9.2.4.2 Impacts to rail crossing should also be considered in the cumulative impact section.] Also, [there is no at grade rail crossing at U.S. Highway 50 at Hazen.] 45

Volume IV Cumulative Impacts

- 46 [Pg. 5-1 Cumulative impacts are not necessarily limited to the region of influence. Future radioactive waste shipments are an example. This is probably only true for construction and not operations.]
- 47 [Pg 5-45 Other regional economic development plans and activities within Nye, Esmeralda, Lyon, and Mineral Counties. Other economic development activities of Churchill County should also be included.]
- 48 [Pg. 5-48 Sec. 5.3.1.1 Residential, commercial, and industrial development activities associated with growth in the Mina rail alignment cumulative impacts region of influence; including the Pahrump area and the Reno-Carson City area adjacent to the northern portion of the Mina rail alignment region of influence. Residential, commercial and industrial development activities associated with growth in Mineral County, Lyon County and Churchill County should also be included. Why is Reno-Carson City included when they are fairly remote from the corridor? Please explain.]
- 49 [Pg 5-45 Sec. 5.3.1.1 Reasonably foreseeable future actions and the continuation of existing actions in the Mina rail alignment cumulative impacts region of influence were also considered. Figure 5-3 shows the locations of individual projects and activities. Churchill County and the future development initiatives in the Hazen area should be included in the impact analysis.]
- 50 [Pg. 5-63 Sec. 5.3.2.2.5 Recreational Land Use. This section should include Lahontan Reservoir and State Park. More than 450,000 visitors a year use the reservoir and the Mina rail line runs adjacent to and within ¼ mile or closer to the reservoir and park facilities. It is difficult to understand how DOE can talk about recreation sites in the cumulative analysis that are further remote from the rail line and not include Lahontan Reservoir. The BLM day use facilities at Walker Lake are further from the rail line than Lahontan Reservoir and recreation activities in Pahrump have little or no relationship to the rail line.]
- 51 Also, [the rail line through Churchill County has a number of private crossings used by offroad vehicles and other recreation land users. Increasing use of the rail line will increase conflicts with recreation users in the area.]
- 52 [Pg. 5-65 With or without the proposed railroad, urbanization and economic development activities, while increasing, would not generally change the overall undeveloped character of the Mina rail alignment region of influence. This statement is not

necessarily true, rail development will stimulate other rail served industrial requirements in Nye, Esmeralda, Lyon, Churchill and Mineral Counties. The growth in industrial development will result in more jobs, housing and development throughout the corridor.]

53 [Pg 5-74 Sec. 5.3.2.9 This section needs to include Churchill County and the Fallon area. Also, local impacts to Lyon County, Mineral County and Churchill County will be greater than anticipated. DOE has set up the socioeconomic impact analysis so that the largest impacts will be absorbed by distant urban areas where cumulative impacts will be small.]

54 [Pg. 5-75 para. 8 Consistent with the methodology established in the Yucca Mountain FEIS (DIRS 155970-DOE 2002, p. 4-43), most of the construction workers for the proposed Mina rail alignment are assumed to be residents of Clark County. This statement is not necessarily true particularly for the northern portions of the route. Major large scale construction projects occur in northwestern Nevada. Few if any workers or construction firms originate in Clark County. What is the basis for this conclusion. Is there another project in northern Nevada that is primarily support by Clark County firms and employees?]

55 [Pg. 5-78 Sec. 5.3.2.10.2 This section needs to include a radiological health and safety analysis for all shipments under expanded repository scenarios.]

56 [The cumulative analysis only discusses potential actions which may have cumulative impacts. There is no analysis of the actual impacts. How much waste could actually be transported to Yucca Mountain including waste from reactors that are not currently built. DOE needs to estimate the shipments and assess the impacts particularly with respect to transportation and radiological risk.]

57 [Pg. 7-1 Table 7-1 is not committed mitigation. It only describes the regulatory framework under which DOE must already operate. There is no mitigation.]



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Pg 2-15 Hydrology- This section simply describes what could happen and not whether there will or will not be impacts. There is no impact analysis.

Pg 2-14 Summary of impacts. The summary generally lacks sufficient qualitative or quantitative analysis.

Pg. 3.4 Para. 4 The Mina Rail Corridor should have included all areas up to Hazen. Yucca Mountain would become the largest user on the rail line. It is difficult to understand how DOE can segment the Mina Rail corridor with the rail line below Wabuska being the corridor and the rail line above it not. Please explain.

Land Use Section- The impact analysis does not quantify or qualify any impacts. The analysis discusses potential conflicts and issues, but does not consider them small, medium or large, why? There are significant impacts when new rail construction occurs on private lands. This section calls for impacts on grazing operations and loss of forage, but offers nothing in terms of mitigation. Why?

Figure 3-1 should be expanded to include Churchill County portion of the Mina Rail Corridor.

Pg. 3-14 DOE failed to include a discussion of Lahontan Reservoir that is adjacent to the Mina Corridor. The reservoir and the Carson River are adjacent to the corridor. Both features are important locally and regionally to provide agricultural and drinking water supplies in the region.

Pg. 3-15 para. 2 The perennial water bodies should include the Carson River and Lahontan Reservoir.

Figure 3.5 DOE should include a similar figure which shows the surface water features in the corridor.

Pg. 3-20 para. 5 What are the impacts to water quality from bridge construction and what is the appropriate mitigation. Please explain.

Section 3.2.3.2.1 Surface water section offers little in the way of impact analysis and nothing in terms of mitigation. More specific details should be provided.

Section 3.2.3.2.2 Groundwater. DOE needs to describes its options to provide adequate water for rail construction activities in the event the State Engineer denies permits for wells supporting construction. Also, DOE needs to describe how it will meet drinking water standards for construction camps in the event groundwater does not meet MCLs.

Section 3.2.3.2.1 This section is incomplete because adequate cultural resource analysis has not been completed for the corridor.

Pg. 3-33 3.2.6.2.2.4 During the shipment of spent nuclear fuel and high-level radioactive waste from the Hazen siding to Yucca Mountain, people along the rail line could be exposed to direct radiation from approximately 9,500 shipping casks. What about people along the corridor from Hazen to Salt Lake City. DOE did not analyze this section of rail. Is it similar to national transportation impacts? Why distinguish the Mina Corridor from national transportation impacts?

Pg. 3-35, Sec. 3.2.7 The region of influence for the socioeconomic analysis is defined as those Nevada counties the Mina rail corridor would cross, and the two areas where most workers would be expected to reside (the Carson City/Washoe County area and Clark County). Churchill County will have far greater socioeconomic impacts than Carson City. It is the largest urban community near the rail line. Furthermore, the County has the construction sector capable for participating in rail construction.

Pg. 3-32 To estimate transportation impacts, DOE defined the region of influence beginning at the Hazen siding in Churchill County, Nevada, and ending at Yucca Mountain. Why does DOE use Hazen to Yucca Mountain as a region of influence and ignore it for socioeconomic and other resources?

Pg. 3-35 The per capita income in this paragraph for Carson City is wrong. The Bureau of Economic Analysis shows 2000 per capita income for Carson City to be \$32,041.

Table 3-10 should have shown Churchill County and other Nevada Counties along the Northern Union Pacific Branchline.

Pg. 3-35, last paragraph- Unless otherwise noted, all general demographic, social, economic, and housing information was estimated by the U.S. Census Bureau during the 2000 decennial national census and was reported in the Census American FactFinder. There is more current socioeconomic data available. Where available, the text should be updated to current. The 2000 Census is nearly 8 years old.

Table 3-11 should be updated with current information. There is current per capita income, housing inventories (Demographer), unemployment, school enrollment, etc. Churchill County should be included in this Table. It has a higher potential for socioeconomic impacts than Carson City.

Table 3-12 Churchill County should have been included in this Table. The table should be updated with more recent information.

Sec. 3.2.7.2.1.3 pg 3-43 There is no discussion of impacts to local emergency response and public safety services for construction and operations. The Hawthorne Army Ammunition Depot has a hazmat team. Will they be utilized in the event of an accident? DOE has completely ignored this issue. Construction certainly results in impacts to local public safety and emergency resources. Where is the analysis?

Pg. 4-1 Cumulative Impact Analysis- The most important cumulative analysis is the past, present and reasonably foreseeable radioactive waste shipments to and from the Yucca Mountain and the Nevada Test Site. With the extension of power plant operating licenses and new applications for nuclear power plants, it is reasonable to assume that waste shipped and stored at Yucca Mountain could increase substantially. The cumulative analysis should have examined this issue.

Pg. 4-1 Cumulative Impacts- DOE needs to examine the increased rail activity and the impacts to transportation in the region.

Pg 4-23 DOE has not addressed the use of groundwater for drinking water supplies and how it intends to meet drinking water standards for human consumption at construction camps.

Sec. 4.2.2.4.2 DOE needs to set forth measures it will implement to control invasive and noxious weeds during construction. Neither the cumulative impact section or the impact analysis addresses this issue. Monitoring should be required.

Volume II Mina Rail Corridor

Alternative Segments. DOE needs to consider alternative segments around the Walker Reservation. With the costs of reconstruction through Indian Lands, DOE could have considered other options to avoid the reservation.

Most of the impact analysis related to the Caliente and Mina Corridor are cursory discussions with little or no real analysis. The impacts are based largely upon qualitative subject judgments.

Section 4.3.2.2.1.2 DOE would need to gain access to private land that falls within the Mina rail alignment construction right-of-way and the locations of support facilities. Segments that would cross private lands include Mina common segment. DOE needs to describe how they will obtain access to private lands, what compensation or mitigation will be provided?

Section 4.3.2.2.3.2 DOE needs to quantify impacts to grazing, set forth committed mitigation, work with permittees and BLM to return the allotment to pre-construction conditions. Grazing operations should not have to incur aum reductions. DOE also needs to quantify the life time value of the loss in grazing.

DOE needs to explain how they would acquire permits for construction camp water and wastewater systems. The water system would need to provide water capable of meeting drinking water standards. Also, details for meeting fireflow requirements and water storage should be noted. Wastewater treatment requires the disposal and use of treated effluent. How will DOE dispose of their treated effluent during the winter months when land application is not possible?

Sec. 4.3.9.2.3.3 DOE needs to ensure that adequate fire suppression exists to control potential for wildland fires. This section did not address emergency medical impacts.

Sec. 4.3.9.12.3.4 Accommodations could be made to decrease the possibility of adverse impacts to local law enforcement capacity. DOE needs to specify those accommodations. Typically, County Sheriffs only have one or two patrol officers available to response to

calls. Responses to distant locations associated with rail construction could have very negative impacts on local public safety capabilities.

Sec. 4.3.9.2.4.2 Impacts to rail crossing should also be considered in the cumulative impact section. Also, there is no at grade rail crossing at U.S. Highway 50 at Hazen.

Volume IV Cumulative Impacts

Pg. 5-1 Cumulative impacts are not necessarily limited to the region of influence. Future radioactive waste shipments are an example. This is probably only true for construction and not operations.

Pg 5-45 Other regional economic development plans and activities within Nye, Esmeralda, Lyon, and Mineral Counties. Other economic development activities of Churchill County should also be included.

Pg. 5-48 Sec. 5.3.1.1 Residential, commercial, and industrial development activities associated with growth in the Mina rail alignment cumulative impacts region of influence; including the Pahrump area and the Reno-Carson City area adjacent to the northern portion of the Mina rail alignment region of influence. Residential, commercial and industrial development activities associated with growth in Mineral County, Lyon County and Churchill County should also be included. Why is Reno-Carson City included when they are fairly remote from the corridor? Please explain.

Pg 5-45 Sec. 5.3.1.1 Reasonably foreseeable future actions and the continuation of existing actions in the Mina rail alignment cumulative impacts region of influence were also considered. Figure 5-3 shows the locations of individual projects and activities. Churchill County and the future development initiatives in the Hazen area should be included in the impact analysis.

Pg. 5-63 Sec. 5.3.2.2.5 Recreational Land Use. This section should include Lahontan Reservoir and State Park. More than 450,000 visitors a year use the reservoir and the Mina rail line runs adjacent to and within ¼ mile or closer to the reservoir and park facilities. It is difficult to understand how DOE can talk about recreation sites in the cumulative analysis that are further remote from the rail line and not include Lahontan Reservoir. The BLM day use facilities at Walker Lake are further from the rail line than Lahontan Reservoir and recreation activities in Pahrump have little or no relationship to the rail line.

Also, the rail line through Churchill County has a number of private crossings used by offroad vehicles and other recreation land users. Increasing use of the rail line will increase conflicts with recreation users in the area.

Pg. 5-65 With or without the proposed railroad, urbanization and economic development activities, while increasing, would not generally change the overall undeveloped character of the Mina rail alignment region of influence. This statement is not

necessarily true, rail development will stimulate other rail served industrial requirements in Nye, Esmeralda, Lyon, Churchill and Mineral Counties. The growth in industrial development will result in more jobs, housing and development throughout the corridor.

Pg 5-74 Sec. 5.3.2.9 This section needs to include Churchill County and the Fallon area. Also, local impacts to Lyon County, Mineral County and Churchill County will be greater than anticipated. DOE has set up the socioeconomic impact analysis so that the largest impacts will be absorbed by distant urban areas where cumulative impacts will be small.

Pg. 5-75 para. 8 Consistent with the methodology established in the Yucca Mountain FEIS (DIRS 155970-DOE 2002, p. 4-43), most of the construction workers for the proposed Mina rail alignment are assumed to be residents of Clark County. This statement is not necessarily true particularly for the northern portions of the route. Major large scale construction projects occur in northwestern Nevada. Few if any workers or construction firms originate in Clark County. What is the basis for this conclusion. Is there another project in northern Nevada that is primarily support by Clark County firms and employees?

Pg. 5-78 Sec. 5.3.2.10.2 This section needs to include a radiological health and safety analysis for all shipments under expanded repository scenarios.

The cumulative analysis only discusses potential actions which may have cumulative impacts. There is no analysis of the actual impacts. How much waste could actually be transported to Yucca Mountain including waste from reactors that are not currently built. DOE needs to estimate the shipments and assess the impacts particularly with respect to transportation and radiological risk.

Pg. 7-1 Table 7-1 is not committed mitigation. It only describes the regulatory framework under which DOE must already operate. There is no mitigation.

70 [S-39 Staging yards and other facilities. Were they evaluated in terms of the following issues:

- Security
- Proximity to populations.
- Cost to secure the sites.]

Volume I –Supplement Environmental Impact Statement

- 12 [Pg. 1-2 Sec. 1.3 States that DOE considered 5 rail corridors in detail. The statement is not necessarily true only limited cursory information was developed for the Carlin Rail corridor. Lander County developed far more information about the corridor than any of the DOE studies.]
- 58 [Pg 1-6 2nd para. It is not necessary to designate the Mina route as a non-preferred alternative. The Mina corridor is superior to the Caliente corridor in nearly all categories. Do the CEQ regulations define non-preferred?]
- 13 [Pg. 2-2 Sec. 2.2.1 The description of the Mina Corridor is misleading. The corridor is comprised of new construction and reconstruction. The existing portion of the rail line from Hazen to Mina is subject to reconstruction. New construction extends from Hawthorne south to Yucca Mountain. The description of the corridor needs to be refined.]
- 71 [Pg. 2-4 Sec. 2.2.1.1 The Mina Corridor originates at Hazen not Wabuska. The text should be corrected.]
- 72 [Pg. 2-5 DOE should consider options for commercial ownership and operations of the rail line.]
- 73 [Pg 2-7 Shared Use Option DOE needs to select the shared use option for either corridor and clearly state that the rail corridor will be open to this use. The EIS should clearly state that under a shared use scenario commercial (non-nuclear) shipments will increase substantially.]
- 74 [Pg. 2-13 Table 2-1 Socioeconomics impacts does not include impacts to Churchill County. The analysis ignored the largest urban area within close proximity to the rail line. Why?]
- 75 [Pg. 2-13 Table 2-1 needs to describe mitigation and monitoring measures to be undertaken by DOE for rail construction.]
- 76 [Pg. 2-14 and 2-15 Land Use. DOE describes the resources and conflicts, but never establishes whether such conflicts are significant adverse environmental impacts or whether the conflicts represent small, median or large impacts. The analysis needs to make some judgment about the impacts.]
- 77 [Pg 2-15 Hydrology- This section simply describes what could happen and not whether there will or will not be impacts. There is no impact analysis.]
- 78 [Pg 2-14 Summary of impacts. The summary generally lacks sufficient qualitative or quantitative analysis.]